

BROEGE, NEUMANN, FISCHER & SHAVER, L.L.C.
ATTORNEYS AT LAW

TIMOTHY P. NEUMANN
PETER J. BROEGE
FRANK J. FISCHER
DAVID E. SHAVER

25 ABE VOORHEES DRIVE
MANASQUAN, NEW JERSEY 08736
PHONE: (732) 223-8484
FAX (732) 223-2416

email:tneumann@bnfsbankruptcy.com

CARL BROEGE
of counsel

January 2, 2019

Honorable Kathryn C. Ferguson, U.S.B.J.
United States Bankruptcy Court
402 East State Street, 3rd Floor
Trenton, NJ 08608
Courtroom 2

Re: Pantaleo Laforgia and Anna Maria Laforgia
Case No. 17-22853(KCF)
Motion for Relief From the Automatic Stay
filed by Toyota Motor Credit Corporation
Return Date: January 8, 2018 @ 10:00 a.m.

Dear Judge Ferguson:

Please accept this letter brief in lieu of a more formal opposition to the motion of Toyota Motor Credit Corporation (“Toyota”) for stay relief (the “Motion”) as to the Debtors’ 2010 Lexus RX 350 (the “Property”).

Within days the Debtors intend to file a Second Modified Plan that accounts for the secured claim of Toyota by making payments of \$705.50 for a period of six months until the amount of 3,848.77 is paid in full at an interest rate of 10%. The debtors are in contact with counsel for Toyota and are awaiting feedback as to acceptance of this payment plan. Today being the last day to oppose Toyota’s Motion, the Debtors are submitting the instant objection.

For the foregoing reasons, it is respectfully requested that the Court deny Toyota's Motion.

Respectfully submitted,

s/ Timothy Neumann
Timothy Neumann

TPN/gpn
cc: KML Law Group, P.C. (Attn: Denise Carlon, Esq.)